



OFFICE OF
**RESEARCH
COMPLIANCE**

Procedures for Restricted Party Screenings

The US government maintains lists of individuals and entities that are restricted or prevented from working in certain domains, including exports. Wright State University has an active export compliance (EC) program and conducts Restricted Party Screening (RPS) as one part of its EC program. Screenings are performed by several departments on campus primarily to review the following:

- All employment finalists
- All vendors, subcontractors, and consultants
- Research collaborators
- All personnel associated with export controlled research
- Foreign visiting scholars, H1-B visa applicants

Wright State subscribes to an online software service called Visual Compliance to conduct RPS. The Export Compliance Officer (ECO) manages user access to Visual Compliance. Anyone seeking to have an account with Visual Compliance must contact the ECO at exportcompliance@wright.edu.

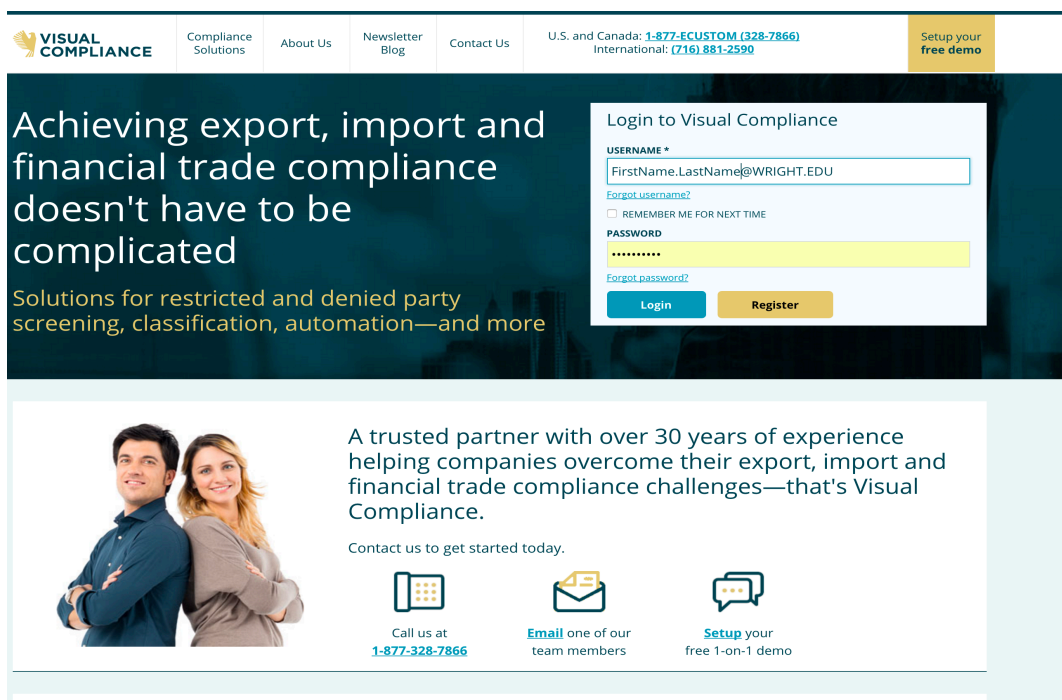
Visual Compliance Best Practices and Procedures

Individual and Company Screening searches for the name of an individual or a company against government restricted party lists. The manual entry of the names of individuals or companies and the selection of search parameters determine the results, which can vary widely depending on those selections.

Using both the name and company fields for a search does not perform two searches at once. Screening the name of the individual and the company should be completed as separate screens.

SCREENING INSTRUCTIONS

1. Go to www.visualcompliance.com.
2. Log in using your log in (email address) and password that you created.



The image shows the top section of the Visual Compliance website. The header includes the company logo, navigation links (Compliance Solutions, About Us, Newsletter Blog, Contact Us), contact information for the U.S. and Canada (1-877-ECUSTOM (328-7866) and International: (716) 861-2590), and a button to 'Setup your free demo'. Below the header is a large banner with the text 'Achieving export, import and financial trade compliance doesn't have to be complicated' and 'Solutions for restricted and denied party screening, classification, automation—and more'. To the right of the banner is a login form titled 'Login to Visual Compliance' with fields for 'USERNAME *' (containing 'FirstName.LastName@WRIGHT.EDU') and 'PASSWORD', a 'Remember me' checkbox, and 'Login' and 'Register' buttons. Below the banner is a section with a photo of a man and a woman, the text 'A trusted partner with over 30 years of experience helping companies overcome their export, import and financial trade compliance challenges—that's Visual Compliance.', and three icons with text: 'Call us at 1-877-328-7866', 'Email one of our team members', and 'Setup your free 1-on-1 demo'.

3. You will then come to a main menu screen. Select “RESTRICTED PARTY SCREENING”.



The image shows the main menu screen of the Visual Compliance website. The header includes the company logo, 'RESEARCH EDITION', and 'eCustoms'. Below the header is a navigation bar with links: CCL/ECCN, ITAR/USML, Inventory, RPS, Regulations, Schedule B, Resources, and Home. The main content area features a large image of laboratory glassware on the left and a list of menu items on the right. The menu items are: 'WELCOME "MATTHEW GRUSHON" [OHIO SYS - WRIGHT STATE UNIVERSITY]', 'CONTROLLED GOODS (CCL/ECCN)', 'U.S. MUNITIONS LIST (ITAR/USML)', 'CLASSIFICATION INVENTORY', 'RESTRICTED PARTY SCREENING' (highlighted with a red arrow), 'ADMINISTRATIVE SCREENING', 'FEDERAL REGULATIONS, RULES, and NOTICES', 'RECENT FEDERAL U.S. DOCUMENTS', 'EXPORT INDUSTRY NEWS HEADLINES', 'DEEMED AND HAND-CARRIED EXPORTS', and 'TECH DATA AND HARDWARE EXPORTS'. Below the menu items are six icons with labels: 'Best Practices', 'Incident Manager', 'Deemed & Hand-Carried', 'Tech Data & Hardware', 'Export Documents', and 'eCustoms'. At the bottom, there is a footer with links: 'LOG OFF', 'TERMS OF USE', 'CONTACT US', 'Copyright © 1981-2017 Visual Compliance', 'Last Update: MAY 18 2017', and a row of icons for 'Online Help', 'Decision Tree', 'Browser Help', 'Change Password', 'User Profile', 'RPS Manager', 'Best Practices', 'Training', and 'Updates Feed'.

4. Enter the full name of the person you are screening in the Name field or the entire name of the institution/company (e.g. vendor, sponsor, or collaborator) in the Company field. It is not necessary to enter the full address for the party being screened, however it is recommended to enter city, state, and/or country.
5. Using the drop-down arrow in the Comment box, select the most appropriate explanation for conducting the screening. Enter a brief description of the purpose of the screening in the box (e.g. service agreement, award). This information will appear on the screening result for record keeping and reference purposes to the screener.

The screenshot displays the 'Visual Compliance' Research Edition interface. At the top, there's a navigation bar with tabs for CCL/ECCN, ITAR/USML, Inventory, RPS (selected), Regulations, Schedule B, Resources, and Home. Below this is a sub-navigation bar with 'RESTRICTED PARTY SCREENING' (selected), 'AUTHORITIES CONSULTED', and 'SANCTION PROGRAMS'. The main header indicates the user is 'REGISTERED USER: MATTHEW GRUSHON, OHIO SYS - WRIGHT STATE UNIVERSITY'.

The 'INDIVIDUAL AND COMPANY SCREENING' section contains the following fields and options:

- Name:** Text input field.
- Company:** Text input field with a dropdown arrow.
- Address:** Text input field.
- City:** Text input field.
- State:** Text input field.
- Country:** Dropdown menu with the text 'Select country if applicable ...'.
- Sponsored Research:** Dropdown menu.
- Search Options:**
 - ☐ Exact
 - ☐ Phonetic
 - ☐ Fuzzy Level: 2 (dropdown)
 - ☒ Stemming
 - ☒ Thesaurus
 - ☒ Field Specific
 - ☒ Remove business words
 - ☐ Weighted
 - ☐ ECCN for country controls check: Select ECCN ... (dropdown)
- Additional Checks:**
 - ☒ Export
 - ☒ Sanctions
 - ☒ GSA
 - ☒ Police
 - ☒ PEP/OIG
 - ☒ International
 - [Reset Defaults](#)

Below these fields is a 'SCREEN' button. A small disclaimer states: 'GSA data is updated in full every business day direct from SAM/EPLS. Fuzzy searches including GSA are automatically limited to level 2. Business endings is not selectable when already set as your profile default. Fuzzy or phonetic search with thesaurus often produces erratic results.'

The 'BLOCKED FOREIGN NATIONALS BY COUNTRY' section includes a dropdown for 'Select country for checklist ...' and a 'GO' button. A note mentions: 'Many foreign nationals are not identified by country in the official sources. This query searches the Export, Sanction, and International list groups, including records having the regular form of the country name in Notes.'

The 'BLOCKED ENTITIES AND FUGITIVE LISTS' section includes a dropdown for 'Select list to display ...' and a 'GO' button. A note states: 'SDN not available here on account of size, please use PDF instead.'

The 'GEOGRAPHIC LOCATION FROM IP ADDRESS' section includes a text input for an IP address and a 'GO' button. A note says: 'May entail a margin of error.'

At the bottom, there are icons for 'RPS Changes', 'GSA Changes', 'Blocked Vessels', 'IAEA Facilities', and 'Risk Country'.

6. Below the comment box are the search parameters. Select the Fuzzy level radio button below the comment boxes and select "2" from the drop-down box (Our standard procedure is to screen parties using the "Fuzzy Level 2" criteria). The Fuzzy Level search will ensure a more comprehensive screening because it looks for words with letters that resemble those searched, compensating for minor spelling errors.
7. Make sure the other radio buttons are selected on the screen:
 - Stemming: Adjusts for word endings (e.g. -ed, -ing), returning results containing the "root" of the word
 - Thesaurus: Accounts for variations in form and style for geographic place names (e.g. UK, United Kingdom) and possible variations of proper names (e.g. Bob, Robert, Bobby)

- Field Specific: Prevents name and company keywords from being searched in the “Notes” field
- Remove business endings and abbreviations: Strips business declarations

8. Once all information has been entered (e.g., name or company, comment information, fuzzy level 2 selected), click the “Screen” button to conduct the screening.

9. A result screen will immediately appear. The Visual Compliance System allows you to either email the result or print it for auditing/record keeping purposes.

SCREENING RESULTS

The result screen will either display a “NO MATCHING RECORDS FOUND” result or a listing of any matching records.

- Each matching record will have a reference number that serves as a direct link to detailed information about the specific match found, including the list on which the name appears and the reason for the restriction.
- Alert levels indicate the number of fields found in the Restricted Party Screening (RPS) database matching the keywords supplied in the search criteria.
- The more search criteria fields supplied with keywords for the search the higher the alert level. As in the example below, the fuzzy search resulted in only one potential match on the name “Boeing” and therefore, the alert level is one.

IF YOU RECEIVE A "HIT" OR MATCH ON THE PERSON OR ENTITY

1. Do an “exact” search using the full name. If you still receive a hit from Visual Compliance (VC), compare the physical addresses (i.e., if you know the person is from the United Kingdom, and you have a hit which says the person is from California, it is probably not the same person). If no location is listed or the locations are the same, look at the birthday of the person screened and compare.
2. If you receive a re-screening “hit” notice from VC, look at the comment section as a reminder as to why the person/entity was initially screened. Also compare the name you initially screened against the names of the “hits” that VC lists below the screen. Because VC screens at a high “fuzzy” level, it is not uncommon for several names to be

listed. Typically, most of the names listed will only include a portion of the name that was originally screened, i.e., not a “hit”.

3. Notify the export control office of a true “hit” or if you need assistance in making a determination at exportcompliance@wright.edu .
4. The export control office will verify any positive “hits” by reviewing the results, the appropriate agency list, and contacting Visual Compliance if necessary.
5. **No payments should be given to or contracts signed with any person or entity positively identified on one of the lists until it has been cleared through the University Export Compliance Officer.**
6. If the “hit” is verified and the University has already conducted transactions with that person or entity, the Office of Research Compliance will notify the screening department and the Office of General Counsel.
7. A determination will then be made as to the next course of action which could include filing a disclosure of a violation to the agency that maintains the list and removing the individual from a project (if applicable).

With any questions, please contact the Export Control Officer at exportcompliance@wright.edu or (937) 775-3853.